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**KTIB AM640**  
**THE NEWS STATION**

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May 25, 1994

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Sir:

I am writing in response to the Commission's request for comment regarding its' rules and procedures in promoting equality of employment and promotional opportunity in broadcasting.

As a small market broadcaster with an AM and FM station, each licensed to two separate communities of less than 50,000 persons, (less than 100,000 per county), and with less than 15 fulltime employees, I can assure you that it is extremely difficult to recruit minorities from within these markets. I single out minorities because we have far greater success in recruiting women for all job categories, including, station manager, sales persons, traffic director and news director.

Operating in the shadow of a major market (New Orleans) where there are likely more minorities interested in broadcasting, few, if any of them, seem interested in moving here or making the daily 60 mile commute to our communities for a career in broadcasting.

Many times, the best opportunity for introducing minorities to broadcasting is by hiring them on a part-time basis and giving them an opportunity to learn the operations and hopefully, move up to full-time. For this reason, I strongly recommend that the Commission give equal credit for part-time hires as it does full-time in small markets. This is, for many, their only entry level opportunity.

Regarding the proposal to impose the obligation of encouraging minority and female entrepreneurs, I respectfully maintain that this would be an unworkable burden on small broadcasters who have limited means to seek out and find such entrepreneurs and to verify their status. Many small market broadcasters operate on small margins of profit, if any, and this proposal would require added employee hours for compliance.

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The Commission could readily decrease its burden in administering its EEO program by simply looking at a stations' hiring record. Should that record show that the station is meeting the FCC's processing guidelines, station would be considered to be in compliance. If, on the other hand, the station is below the FCC's guidelines, then, it should be allowed to document its efforts and to show cause why it could not meet the parity levels. In the absence of any charge of racial or gender discrimination, a station should be given the benefit of the doubt if it can show strong efforts in recruiting. No such showing should be required if the station is, in fact meeting the guidelines.

Regarding the proposed changes to the Commissions EEO inquiry letters, the above comments would also apply. Adding burdensome paperwork to broadcasters adds additional work to the Commission as well and where there is no evidence of discrimination or failure to recruit minorities and women the Commission should rely on the hires during the past three years. Seven years of documentation is a paperwork nightmare no one needs.

Form 396 should continue to include the number of part-time hires if the FCC will give credit for those hires in assessing compliance.

A final word. Small market broadcasters generally do not have the personnel and means to absorb additional regulatory burdens. We operate in the public interest of all listeners including women and minorities and we try very hard to find and employ such workers. It is not easy. Broadcasting is not the only industry with a mandated mission to hire minorities and we compete with all these other industries for these employees. A recent example: We hired a young black woman who had just completed her college training to be our News Director. After working and training with us for eight months and at the point of becoming a truly valuable employee, she was hired away by Tulane University in New Orleans at a salary substantially higher than we could possibly pay.

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To summarize:

Small markets should be defined as counties at least under 100,000 population and/or stations with 15 or fewer employees.

The Commission should give equal credit to part-time and full-time employees.

Small market stations should not be obligated to seek minority and female entrepreneurs with which to do business.

The Commission could reduce considerably its administrative burdens by reducing the administrative burdens of station, i.e. the less paperwork for stations equals less work for the Commission. The effectiveness of the FCC's EEO policies could be better determined by looking at the results of a station's efforts, not at the efforts alone.

The Commission should retain its three year period for detailed EEO information.

The Commission should also retain its present Form 396 to obtain information for both, fulltime and parttime hires. Nor should the Commission revise its renewal application for more extensive recruitment and hiring information for the twelve month period prior to the renewal filing date. Again, if the Commission would simply focus on a station's hiring results, such recruitment information would not be necessary except in cases where hiring is deficient and efforts need to be presented.

I would like to thank the Commission for this opportunity to present the views of a small market broadcaster. We share the goals of the Commission to encourage the hiring of female and minorities and believe that the proof is in the hiring. If hiring is at parity or above, no further documentation or paperwork should be required.

Respectfully,

  
Raymond A. Saadi  
Managing Partner, KHOM FM  
VP/GM KTIB AM

Enclosed with this original are five copies.